

APPEAL NO: 03-21-00053-CV

In the Court of Appeals for Third District of Texas FILED IN
3rd COURT OF APPEALS
AUSTIN, TEXAS

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JEFFREY D. KYLE
Clerk

Mary Louise Serafine,
PLAINTIFF-APPELLANT,

v.

*Karin Crump, in her individual and official capacities as Presiding Judge of the
250th Civil District Court of Travis County, Texas; and Melissa Goodwin, in
her individual and official capacities as Justice of the Third Court of Appeals
at Austin, Texas; David Puryear and Bob Pemberton, in their individual
capacities as former justices of the Third Court of Appeals at Austin, Texas,*
DEFENDANTS-APPELLEES.

**ON APPEAL FROM THE 345TH JUDICIAL DISTRICT COURT OF TRAVIS
COUNTY, TEXAS**

**APPELLEE JUDGE KARIN CRUMP'S UNOPPOSED FIRST MOTION
FOR EXTENSION OF TIME TO FILE APPELLEE'S BRIEF**

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TO THE HONORABLE THIRD COURT OF APPEALS:

Appellee Judge Karin Crump files this unopposed request for her first extension of the deadline to file her Appellee's Brief. On June 21, 2021 Appellant filed her sixty-four (64) page brief, accompanied by an appendix totaling another one hundred and eighteen (118) pages of record excerpts. Prior to filing Appellant's Brief, on June 17, 2021, Serafine filed her motion for a fourth extension of time to file Appellant's Brief. On June 23, Serafine filed her Supplement to Appellant's Motion for Extension of Time to File Appellant's Brief. On June 24, 2021, the Court denied Appellant's fourth motion for extension as moot, deeming Appellant's Brief as filed on June 21, 2021. On June 28, 2021, Appellant simultaneous filed in this Court, as well as in the Texas Supreme Court "Appellant's Renewed Motions Arising from New Events" in this appeal, No. 03-21-00053-CV, *Mary Louise Serafine v. Karin Crump, et al*, No. 03-20-00294-CV, as well as in No. 03-20-00294-CV, *Mary Louise Serafine v. Alexander Blunt et al*. In the instant case Appellant again sought an extension of time to supplement her brief. Appellant's Motion was denied by this Court on June 30, 2021.

Appellee Judge Crump seeks a thirty (30) day first extension of time to allow for sufficient time to adequately brief the myriad of issues addressed in Appellant's brief in light of the demands of the undersigned counsel's existing docket and the vacation schedule of counsel. In addition to counsel's normal docket demands, Mr. Pope, co-counsel for Appellee was on vacation from July 8 -13, 2021, and the undersigned counsel is on vacation from July 17-23, 2021. In light of these factors, coupled with the length of Appellant's Brief and the Record in this matter, an extension of time is necessary to adequately brief the issues on appeal in this case.

On July 13, 2021, the undersigned counsel conferred with Appellant regarding the filing of this motion. Appellant is UNOPPOSED to Appellee Judge Crump's First Motion for Extension of Time. Appellee Judge Crump's First Motion for Extension of Time is not sought solely for purposes of delay or any other improper purpose. This Court should allow a thirty-day extension of time for movant to prepare her Appellee's Brief.

CONCLUSION

Appellee Crump respectfully requests that this Court grant her first motion for a thirty (30) day extension of time to file her Appellee's Brief, extending her deadline to August 20, 2021.

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By: /s/ Anthony J. Nelson
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NOTICE OF ELECTRONIC FILING

I, **ANTHONY J. NELSON**, Assistant County Attorney, do hereby certify that I have electronically submitted for filing, a true and correct copy of the foregoing in accordance with the eFile Texas system of the 3rd Court of Appeals on July 14, 2021.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

CERTIFICATE OF SERVICE

I, **ANTHONY J. NELSON**, Assistant County Attorney, do hereby certify that a true and correct copy of the above and foregoing has been served via email, through eFile Texas, on July 14, 2021, to all counsel of record.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

RULE 9.4(I) CERTIFICATE OF COMPLIANCE

I certify that this computer-generated document, accounting for Rule 9.4(i)(1)'s inclusions and exclusions, is 366 words, as calculated by Microsoft Word 2016, the computer program used to prepare this document.

/s/ Anthony J. Nelson
ANTHONY J. NELSON
Assistant County Attorney

CERTIFICATE OF CONFERENCE

On July 13, 2021, on behalf of Appellee, Judge Karin Crump, counsel for Judge Crump conferred with Plaintiff-Appellant, a licensed attorney, regarding the filing of Appellee Judge Karin Crump's First Motion for Extension of Time to File Appellee's Brief. Plaintiff-Appellant indicated she is UNOPPOSED to the filing of same. On July 14, 2021, on behalf of Appellee, Judge Karin Crump, counsel for Judge Crump conferred with Assistant Attorney General, Courtney Corbello, counsel of record for Defendants-Appellees, Justices Melissa Goodwin David Puryear and Bob Pemberton, regarding the filing of Appellee Judge Karin Crump's First Motion for Extension of Time to File Appellee's Brief. Counselor Corbello likewise indicated she is UNOPPOSED to the filing of same.

/s/ Anthony J. Nelson

ANTHONY J. NELSON

Assistant County Attorney

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